

1 THE HONORABLE THOMAS S. ZILLY  
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7 UNITED STATES DISTRICT COURT  
8 WESTERN DISTRICT OF WASHINGTON

9 BUNGIE, INC.,

10 Plaintiff,

11 v.

12 AIMJUNKIES.COM; PHOENIX  
13 DIGITAL GROUP LLC; DAVID  
SCHAEFER; JORDAN GREEN;  
JEFFREY CONWAY; AND JAMES  
MAY,

14 Defendants.

15 No. 2:21-cv-811-TSZ

16 DECLARATION OF EDWARD KAISER IN  
17 SUPPORT OF PLAINTIFF BUNGIE,  
18 INC.'S MOTION FOR SUMMARY  
19 JUDGMENT

20 **EXHIBIT 2**  
**FILED UNDER SEAL**

21 I, Edward Kaiser, declare as follows:

22 1. I am an Engineering Lead for Plaintiff Bungie, Inc. ("Bungie" or "Plaintiff"). I  
23 submit this declaration in support of Plaintiff Bungie, Inc.'s Motion for Summary Judgment. I  
have personal knowledge of the facts stated herein and, if called upon, could and would testify  
competently thereto under oath.

24 2. I earned a Bachelor of Applied Science in Computer Engineering from the  
University of Waterloo in 2003. In 2010, I graduated from Portland State University with a Ph.D.  
in Computer Science, Network Security.

25 3. I have been employed by Bungie since October 2010. From October 2010 through  
September 2011, I was an Associate Engineer, working on preproduction of the video game  
*Destiny*. I was then promoted to Engineer at Bungie, a position that I held for over four years. As

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1 an Engineer, I worked on the video game *Destiny* as part of the Matchmaking team. My  
 2 responsibilities at that time included designing and implementing core game systems for both  
 3 *Destiny* and *Destiny 2*. In October 2015, I was again promoted to Senior Engineer, during which  
 4 time my responsibilities included working on research and development for future versions of  
 5 *Destiny* and *Destiny 2*, collaborating with designers and other engineers to develop feature  
 6 specifications, and working with other engineers to overhaul and modernize the *Destiny* and  
 7 *Destiny 2* game engines, i.e., the software that supports gameplay, networking, and display, among  
 8 other functions.

9       4. I became an Engineering Lead at Bungie in June 2018. In this role, I led the *Destiny*  
 10 games-as-a-service Vanguard Engineering team. I was responsible for the technical aspects of  
 11 shipping major releases quarterly, and frequent (sometimes weekly) hotfixes in between major  
 12 releases. I built technical plans, evaluated technical and design risks, and ensured new game  
 13 experiences fit within memory and perf budgets.

14       5. Since October 2021, I have led the Product Security Team within the Central  
 15 Technology group. I am responsible for the technical aspects of software security for all Bungie  
 16 products. I manage a team of senior engineers and security analysts. I review technical plans,  
 17 evaluate technical risks, and ensure that Bungie products are as secure as possible.

18       6. *Destiny 2* is a video game that was released in September 2017, that is now a free-  
 19 to-play game with paid expansions, continually refreshed downloadable content (“DLC”), and an  
 20 estimated player base of over 30 million players. Among other DLC, one of Bungie’s recent  
 21 expansions is *Destiny 2: Beyond Light*, released on November 10, 2020.<sup>1</sup>

22       7. I am intimately familiar with the *Destiny* and *Destiny 2* game engines, including  
 23 the software code on which they are based, having developed and improved core systems since  
 24 *Destiny* preproduction in October 2011. Specifically, I have written and helped develop code for

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26       1 For ease of reference, *Destiny 2* and *Destiny 2: Beyond Light* are collectively referred to hereafter as  
 “*Destiny 2*”.

1 networking that directly interacts with player inputs, and player and combatant positioning data  
 2 structures.

3       8. I also have substantial experience identifying, investigating, and implementing  
 4 fixes to stop cheaters and other bad actors in *Destiny 2*. Cheat software is computer code that  
 5 copies, modifies, and/or interacts with a game engine, such as the engine for *Destiny 2*, in order to  
 6 enable the user of the cheat software to perform certain actions or see certain information within  
 7 *Destiny 2* that non-cheating players cannot do or see. For example, cheat software may enable a  
 8 cheat user to see non-cheating players through solid walls, to automatically aim their weapon at a  
 9 non-cheating player without requiring any input by the cheat user, or to modify the cheat user's  
 10 character or weapon attributes.

11      9. My experience identifying, investigating, and implementing fixes to stop cheaters  
 12 includes my Ph.D thesis, which incorporated novel techniques for identifying cheaters and  
 13 proportionally limiting their access based on the scale of their negative impact within the game,  
 14 advising on various security features within the *Destiny 2* game engine including special  
 15 networking to prevent Distributed-Denial-of-Service attacks on players as well as matchmaking  
 16 and game designs to mitigate some of the impact of cheaters on non-cheating players, and  
 17 investigations into *Destiny 2* cheat software and those who develop it.

18      10. I am familiar with the cheat software sold by Defendants AimJunkies.com, Phoenix  
 19 Digital Group LLC, David Schaefer, and James May (collectively, "Defendants") through the  
 20 website AimJunkies.com (hereafter, the "Cheat Software"). I first learned of the Cheat Software  
 21 on October 13, 2021 as I took over leadership of the Product Security team and was debriefed on  
 22 the status of a number of ongoing investigations. Bungie routinely collects information about  
 23 cheat activity detected in *Destiny 2*, including information about the hardware, account, and IP  
 24 addresses used to access the software; and collects reports from impacted non-cheating players.  
 25 In the case of AimJunkies, having identified a large volume of cheating activity, Bungie purchased  
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1 access to the Cheat Software. The team operated the cheat software to verify its features. I have  
 2 reviewed and understand this analysis, which I describe in detail below.

3       11. I am also familiar with the operation of the “Cheat Loader” that has been distributed  
 4 through AimJunkies.com and that provides access to and works in tandem with the Cheat Software  
 5 to perform the Cheat Software’s functions.

6       12. The Cheat Software purports to include a feature titled Extra-Sensory Perception  
 7 (“ESP”), which allows users of the Cheat Software to see the location of other *Destiny 2* players  
 8 and non-player characters, including through solid walls, by displaying a distinct box around the  
 9 other players, displaying the players’ names, and their distance from the cheat user. In order to  
 10 show the cheat users the location of players in *Destiny 2*, the Cheat Software needs to (a) ascertain  
 11 the location of other players and (b) display the relevant information to the cheat user. Both of  
 12 these actions require copying and modifying Bungie’s software code in *Destiny 2*.

13       13. One part of Bungie’s software code for *Destiny 2* consists of data structures that  
 14 correspond to certain attributes of *Destiny 2*, including, for example, player positioning (i.e., where  
 15 each *Destiny 2* player and non-player character is located in *Destiny 2* at any given moment). The  
 16 data structures provide a precise layout for individual pieces of data stored and organized in a  
 17 computer’s memory so that the video game functions as intended when running on the players’  
 18 computers. For example, the player positioning data tells the software where a player is located  
 19 within the world of *Destiny 2*, including the player’s position, movement, and facing.

20       14. Another part of Bungie’s software code for *Destiny 2* consists of data structures and  
 21 functions dedicated to *Destiny 2*’s rendering, which determines what each player sees from their  
 22 character’s perspective and where the player is aiming their character’s weapon while playing  
*Destiny 2*.

23       15. To enable the Cheat Software’s ESP feature, the Defendants needed to copy the  
 24 data structures associated with player positioning in *Destiny 2* to ascertain the location of other  
 25 characters, and reverse engineer the software code for *Destiny 2*’s rendering functions to modify  
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1 what is displayed. Defendants then had to incorporate cheat software derived from copied *Destiny*  
 2 code into every copy of the Cheat Software that they sold or distributed.

3       16. To use the Cheat Software, the cheat user runs an authentic copy of *Destiny 2* on  
 4 their computer while also running a copy of the Cheat Software. In order for the Cheat Software  
 5 features to work while playing *Destiny 2*, the Cheat Software injects into (i.e., runs its software  
 6 code inside) the *Destiny 2* engine. The Cheat Software is injected by the “Cheat Loader”  
 7 component of the Cheat Software. The injected code extracts information to which the cheat user  
 8 does not ordinarily have access from the player positioning data structures and then manipulates  
 9 the rendering data structures and calls the camera and display functions (that are ordinarily only  
 10 called by other game functions within authentic copy of *Destiny 2*) to create the modified *Destiny 2*  
 11 that displays boxes and player information around other characters.

12       17. The Cheat Software includes another feature titled “AIMBOT,” which allows  
 13 Cheat Software users to aim their weapons automatically and accurately at other *Destiny 2* player  
 14 and non-player characters with little to no input (i.e., movement of the mouse and/or controller  
 15 joystick) by the cheat users.

16       18. As with the ESP feature, the AIMBOT feature of the Cheat Software could only  
 17 function in *Destiny 2* if Defendants copied the *Destiny 2* software code that corresponds to the data  
 18 structures for player positioning (i.e., which includes where the player is aiming their weapon),  
 19 and/or reverse engineered the *Destiny 2* software code that calculates the angle deltas for mouse  
 20 movements (i.e., software code used to calculate how far the weapon cursor moves in *Destiny 2* in  
 21 response to inputs). Defendants then incorporated cheat software derived from copied *Destiny 2*  
 22 code into every copy of Defendants’ Cheat Software that they sold or distributed.

23       19. In order for the Cheat Software to call the necessary functions within *Destiny 2* to  
 24 enable Cheat Software users to automatically aim at other players, the Cheat Software must inject  
 25 code into the authentic copy of *Destiny 2* on the users’ computers. The injected code modifies the  
 26 player input data structures and calls functions in *Destiny 2* to automatically aim at other players.

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1       20. The Cheat Software includes another feature known as “One Position Kill”  
2 (“OPK”), similar to another feature referred to as “teleport to crosshair,” which allows Cheat  
3 Software users to cause other players and characters to either respawn at or move (teleport) to a  
4 single position so that they may all be damaged by area-of-effect abilities at once, accelerating the  
5 rate at which cheat users accumulate rewards and accolades. In other words, the OPK cheat feature  
6 automatically teleports characters to a position advantageous to the cheat user, something that is  
7 not permitted in the normal operation of *Destiny 2*. The OPK feature does not change the victim’s  
8 display, so that they are often unaware of exactly how they have been victimized.

9       21. As with the ESP feature, the OPK feature of the Cheat Software could only function  
10 in *Destiny 2* if Defendants copied the *Destiny 2* software code that corresponds to the data  
11 structures for player and combatant positioning. Defendants would then have had to incorporate  
12 cheat software derived from copied *Destiny 2* code into every copy of Defendants’ Cheat Software  
13 that they sold or distributed.

14       22. In order for the Cheat Software to call the necessary functions and manipulate the  
15 character positions to enable Cheat Software users to teleport other characters to one position, the  
16 Cheat Software must inject code into the authentic copy of *Destiny 2* on the cheat users’ computers.  
17 The injected code modifies the player input data structures and calls functions in *Destiny 2* to  
18 teleport the other characters.

19       23. Bungie periodically modifies or updates the *Destiny 2* software code when new  
20 DLC is released or to fix known errors or bugs in the software code. These modifications or  
21 updates frequently include changes to the software code associated with the player positioning  
22 data structures, the rendering code, and other relevant data structures. If an update to the *Destiny*  
23 2 software code included updates to any code that the Cheat Software copies and/or modifies in  
24 order to provide its features, Defendants would need to update the Cheat Software to correspond  
25 with the changes to the *Destiny 2* software code. This would necessarily entail creating new copies  
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1 of the updated *Destiny 2* data structures and software code, and incorporating those new copies  
 2 into Defendants' updated Cheat Software.

3       24. Through at least December 2020, Bungie received over 6,000 reports from non-  
 4 cheating *Destiny 2* players that other *Destiny 2* players were using the Cheat Software to obtain  
 5 unfair advantages over non-cheating players. Based on these reports, Bungie has been able to  
 6 identify 99 users of the Cheat Software and has banned those users from *Destiny 2*. Attached  
 7 hereto as **Exhibit 1** is a true and correct copy of a spreadsheet generated from Bungie's reporting  
 8 database aggregating over 6,000 reports from players about cheaters caught using AimJunkies  
 9 software. Bungie has spent hundreds of thousands of dollars combatting cheaters and cheat  
 10 developers such as Defendants in order to protect its player base.

11       25. Attached hereto as **Exhibit 2** is a true and correct copy of a spreadsheet that is an  
 12 export of data from Bungie's database corresponding to the bans of all account that have been  
 13 identified as associated with Defendant James May. This document was produced bearing Bates  
 14 number BUNGIE\_WDWA\_0000409. Column 2 describes the reason why May was banned, and  
 15 Column 3 identifies evidence supporting the reason why May was banned, including the file paths  
 16 and MD5 hashes associated with files that May attempted to connect to *Destiny 2* and/or that were  
 17 running on the machine at the same time that *Destiny 2* was operating, which were detected by the  
 18 *Destiny 2* process that obtains metadata (e.g., file headers containing file path information) from  
 19 files that connect to or are running while *Destiny 2* was operating. Among other things, this  
 20 spreadsheet shows at least 102 instances in which May attempted to reverse engineer *Destiny 2*  
 21 and circumvent Bungie's technological protection measures against such reverse engineering.

22       26. An MD5 hash is an industry standard cryptographic method for verifying the  
 23 integrity of bits of data in question. As relevant here, it is a string of numbers and letters that  
 24 serves as a unique identifier of a particular file.

27. Attached hereto as **Exhibit 3** is a true and correct screenshot from *Destiny 2* without the Cheat Software operating. This document was produced bearing Bates number BUNGIE WDMA 0000326.

28. Bungie used the Cheat Software once to conclude that the various features of the Cheat Software were functional. After its first use, the Cheat Software stopped working and Bungie was unable to relaunch it. Bungie has never had a copy of the Cheat Software on a machine capable of analyzing it.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 20 day of July, 2023.

Edward Kaiser

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# **EXHIBIT 1**

Column1	Column2	Column3	Column4	Column5	Column6	Column7
AccountId	Description	Evidence	DateInfractionDetected	DateInfractionOccurred	EvidenceHash	IPAddress
4611686018489747288	Reverse Engineering Tool Attached	c:\users\james\desktop\reclass\blah64.exe (4D09FFB3B8CFE53A8250D1A112C4CDE3)	2019-10-02 23:44:11.937	2019-10-02 23:37:10.013	NULL	174.97.110.18
4611686018492287262	Reverse Engineering Tool Attached	c:\users\james\desktop\reclass\blah64.exe (4D09FFB3B8CFE53A8250D1A112C4CDE3)	2019-10-16 12:22:11.800	2019-10-14 20:21:02.553	NULL	174.97.110.18
4611686018492533333	Reverse Engineering Tool Attached	c:\users\james\desktop\reclass\blah64.exe (4D09FFB3B8CFE53A8250D1A112C4CDE3)	2019-10-16 21:42:29.103	2019-10-16 16:32:09.140	NULL	174.97.110.18
4611686018492633712	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-10-17 19:48:17.493	2019-10-17 19:48:17.427	NULL	174.97.110.18
4611686018492641557	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-10-17 21:48:19.567	2019-10-17 21:48:19.520	NULL	174.97.110.18
4611686018492641557	Reverse Engineering Tool Attached	c:\users\james\desktop\reclass\blah64.exe (4D09FFB3B8CFE53A8250D1A112C4CDE3)	2019-10-17 21:49:28.757	2019-10-17 21:30:56.767	NULL	174.97.110.18
4611686018492887002	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-10-20 02:56:35.483	2019-10-20 02:56:35.423	NULL	174.97.110.18
4611686018492887002	Reverse Engineering Tool Attached	c:\users\james\desktop\reclass\blah64.exe (4D09FFB3B8CFE53A8250D1A112C4CDE3)	2019-10-20 03:00:07.350	2019-10-20 02:41:13.607	NULL	174.97.110.18
4611686018492957059	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-10-20 16:09:29.003	2019-10-20 16:09:28.943	NULL	174.97.110.18
4611686018493059627	Reverse Engineering Tool Attached	c:\users\james\desktop\reclass\blah64.exe (4D09FFB3B8CFE53A8250D1A112C4CDE3)	2019-10-21 19:04:54.133	2019-10-21 17:52:34.837	NULL	174.97.110.18
4611686018493077722	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-10-21 22:22:19.980	2019-10-21 22:22:19.923	NULL	174.97.110.18
4611686018493084226	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-10-21 23:39:58.117	2019-10-21 23:39:58.070	NULL	174.97.110.18
4611686018493089147	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-10-22 00:59:36.877	2019-10-22 00:59:36.667	NULL	174.97.110.18
4611686018493089147	Reverse Engineering Tool Attached	c:\users\james\desktop\reclass\blah64.exe (4D09FFB3B8CFE53A8250D1A112C4CDE3)	2019-10-22 01:00:44.603	2019-10-22 00:57:00.783	NULL	174.97.110.18
4611686018493137319	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-10-22 20:44:47.643	2019-10-22 20:44:47.570	NULL	174.97.110.18
4611686018493137319	Reverse Engineering Tool Attached	c:\users\james\desktop\reclass\blah64.exe (4D09FFB3B8CFE53A8250D1A112C4CDE3)	2019-10-22 21:04:42.607	2019-10-22 21:03:37.427	NULL	174.97.110.18
4611686018493168821	Reverse Engineering Tool Attached	c:\users\james\desktop\reclass\blah64.exe (4D09FFB3B8CFE53A8250D1A112C4CDE3)	2019-10-23 02:02:06.590	2019-10-23 01:22:40.183	NULL	174.97.110.18
4611686018493223399	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-10-28 18:14:34.183	2019-10-28 18:14:33.950	NULL	174.97.110.18
4611686018493659725	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-10-28 21:54:35.040	2019-10-28 21:54:34.970	NULL	174.97.110.18
4611686018493717398	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-10-29 20:55:25.653	2019-10-29 20:55:25.580	NULL	174.97.110.18
4611686018493729046	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-10-30 17:15:44.713	2019-10-30 17:15:44.583	NULL	174.97.110.18
4611686018496674221	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-12-10 22:15:23.623	2019-12-10 22:14:52.953	NULL	174.97.110.18
4611686018496674221	Reverse Engineering Tool Attached	c:\users\james\desktop\reclass\blah64.exe (4D09FFB3B8CFE53A8250D1A112C4CDE3)	2019-12-10 22:16:09.613	2019-12-10 21:57:13.673	NULL	174.97.110.18
4611686018496692792	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-12-11 04:15:15.267	2019-12-11 03:57:25.127	NULL	174.97.110.18
4611686018496756613	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-12-12 17:03:11.263	2019-12-12 17:02:35.917	NULL	174.97.110.18
4611686018496759033	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-12-12 18:22:46.190	2019-12-12 18:15:37.820	NULL	174.97.110.18
4611686018496766601	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-12-12 21:42:51.693	2019-12-12 21:32:50.903	NULL	174.97.110.18
4611686018496769019	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-12-12 22:42:50.537	2019-12-12 22:41:15.953	NULL	174.97.110.18
4611686018496775818	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-12-13 01:42:49.917	2019-12-13 01:26:17.977	NULL	174.97.110.18
4611686018496775818	Reverse Engineering Tool Attached	g:\work files\reclass\x64\renamedreclass.exe (360B1FE16603C1106CD8DEF992846B1B)	2019-12-13 01:43:49.417	2019-12-13 01:33:57.580	NULL	174.97.110.18
4611686018496777696	Reverse Engineering Tool Attached	g:\work files\reclass\x64\renamedreclass.exe (360B1FE16603C1106CD8DEF992846B1B)	2019-12-13 17:43:28.150	2019-12-13 17:40:11.400	NULL	174.97.110.18
4611686018496777696	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-12-13 19:02:47.807	2019-12-13 19:00:15.267	NULL	174.97.110.18
4611686018496811247	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-12-13 20:02:55.677	2019-12-13 19:54:31.650	NULL	174.97.110.18
4611686018496816978	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-12-13 22:02:48.560	2019-12-13 21:58:37.170	NULL	174.97.110.18
4611686018496862882	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-12-15 19:03:13.757	2019-12-15 18:49:25.353	NULL	174.97.110.18
4611686018496946496	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-12-15 20:43:09.617	2019-12-15 20:23:13.113	NULL	174.97.110.18
4611686018496950450	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-12-15 23:22:57.583	2019-12-15 23:18:24.607	NULL	174.97.110.18
4611686018496957418	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-12-16 00:42:59.443	2019-12-16 00:40:28.607	NULL	174.97.110.18
4611686018496960184	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-12-16 19:42:58.557	2019-12-16 19:41:45.220	NULL	174.97.110.18
4611686018496994114	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-12-16 21:03:04.000	2019-12-16 21:00:12.850	NULL	174.97.110.18
4611686018496997497	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-12-16 22:43:00.293	2019-12-16 22:38:17.347	NULL	174.97.110.18
461168601849700009	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-12-16 23:42:54.323	2019-12-16 23:37:02.397	NULL	174.97.110.18
4611686018497003700	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-12-17 01:02:54.590	2019-12-17 00:59:35.603	NULL	174.97.110.18
4611686018497007001	GameCheats.AimJunkies binary found	\??\g:\work files\reclass\x64\plugins\reclasskernel64.sys (8D98DB3A27112A9C92558FF90A1D6206)	2020-01-03 23:24:01.700	2019-12-17 02:37:28.413	GameCheats.AimJunkies (8D98DB3A27112A9C92558FF90A1D6206)	174.97.110.18
		\??\c:\anobx14.sys (6E73A01E5DFC8D8DEA4D8A99E9273A04)				
4611686018497030021	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-12-17 18:22:52.537	2019-12-17 18:17:29.427	NULL	174.97.110.18
4611686018497039107	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-12-17 22:23:15.980	2019-12-17 22:06:44.493	NULL	174.97.110.18
4611686018497067752	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-12-18 17:02:59.437	2019-12-18 16:57:51.760	NULL	174.97.110.18
4611686018497071115	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-12-18 18:23:16.457	2019-12-18 18:06:01.643	NULL	174.97.110.18
4611686018497074765	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-12-18 21:03:20.287	2019-12-18 20:46:09.050	NULL	174.97.110.18
4611686018497078336	Played on soft banned device	Swifty's Reverse Engineering Machine (rule 19)	2019-12-19 15:23:17.483	2019-12-19 15:08:53.197	NULL	174.97.110.18
4611686018498080495	GameCheats.AimJunkies binary found	\??\c:\9w3x5pps7				

Column1	Column2	Column3	Column4	Column5	Column6	Column7
AccountId	Description	Evidence	DateInfractionDetected	DateInfractionOccurred	EvidenceHash	IPAddress
4611686018498223179	Ban Evasion	Sw1fty dev box	2020-01-07 00:00:00.000	2020-01-07 00:00:00.000	NULL	NULL
4611686018498245097	Ban Evasion	Sw1fty dev box	2020-01-08 00:00:00.000	2020-01-08 00:00:00.000	NULL	NULL
4611686018498285340	Ban Evasion	Sw1fty dev box	2020-01-09 00:00:00.000	2020-01-09 00:00:00.000	NULL	NULL
4611686018500552040	GameCheats.AimJunkies binary found	\??\g:\work files\reclass\x64\plugins\reclasskernel64.sys (8D98DB3A27112A9C92558FF90A1D6206)	2020-03-10 18:41:46.317	2020-03-10 18:26:32.940	GameCheats.AimJunkies (8D98DB3A27112A9C92558FF90A1D6206)	174.97.110.18
4611686018500552040	Reverse Engineering Tool Attached	g:\work files\reclass\x64\renamedreclass.exe (360B1FE16603C1106CD8DEF992846B1B)	2020-03-10 18:45:03.527	2020-03-10 18:30:46.920	NULL	174.97.110.18
4611686018500556439	GameCheats.AimJunkies binary found	\??\g:\work files\reclass\x64\plugins\reclasskernel64.sys (8D98DB3A27112A9C92558FF90A1D6206) \??\c:\ydhtxue.sys (6E73A01E5DFC8D8DEA4D8A99E9273A04)	2020-03-10 22:40:44.983	2020-03-10 22:24:23.337	GameCheats.AimJunkies (8D98DB3A27112A9C92558FF90A1D6206)	174.97.110.18
4611686018506275939	AimJunkies binary found	\??\c:\21pvaokvh4e9.sys (6E73A01E5DFC8D8DEA4D8A99E9273A04)	2020-08-05 17:26:59.550	2020-08-05 17:11:42.770	AimJunkies (6E73A01E5DFC8D8DEA4D8A99E9273A04)	67.219.146.74
4611686018506305298	AimJunkies binary found	\??\c:\jmryvv9hcu.sys (6E73A01E5DFC8D8DEA4D8A99E9273A04)	2020-08-06 16:27:08.193	2020-08-06 16:13:14.213	AimJunkies (6E73A01E5DFC8D8DEA4D8A99E9273A04)	67.219.146.76
4611686018506332946	AimJunkies binary found	\??\c:\ph1jonb5hyg8.sys (6E73A01E5DFC8D8DEA4D8A99E9273A04)	2020-08-06 22:26:54.307	2020-08-06 22:02:08.137	AimJunkies (6E73A01E5DFC8D8DEA4D8A99E9273A04)	67.219.146.74
4611686018506342576	AimJunkies binary found	\??\c:\o44n8.sys (6E73A01E5DFC8D8DEA4D8A99E9273A04)	2020-08-07 01:06:56.573	2020-08-07 00:36:27.013	AimJunkies (6E73A01E5DFC8D8DEA4D8A99E9273A04)	174.97.110.18
4611686018506487694	Played on soft banned device	Repeated Ban Evasion Sw1fty box (rule 388)	2020-08-11 17:08:24.460	2020-08-11 17:04:34.737	NULL	67.219.146.73
4611686018509182098	AimJunkies binary found	\??\g:\work files\reclass\x64\plugins\reclasskernel64.sys (8D98DB3A27112A9C92558FF90A1D6206)	2020-11-11 04:47:27.237	2020-11-11 04:30:28.810	AimJunkies (8D98DB3A27112A9C92558FF90A1D6206)	67.219.146.77
4611686018509182098	Reverse Engineering Tool Attached	g:\work files\reclass\x64\reclass.net.exe (360B1FE16603C1106CD8DEF992846B1B)	2020-11-11 04:47:56.237	2020-11-11 04:29:53.170	NULL	67.219.146.77
4611686018509183407	Played on soft banned device	Repeated Ban Evasion Sw1fty box (rule 388)	2020-11-11 05:26:11.203	2020-11-11 05:23:24.387	NULL	174.97.110.18
4611686018509183407	AimJunkies binary found	\??\c:\m4az3h6x42w7.sys (6E73A01E5DFC8D8DEA4D8A99E9273A04)	2020-11-11 05:27:16.013	2020-11-11 05:08:46.957	AimJunkies (6E73A01E5DFC8D8DEA4D8A99E9273A04)	174.97.110.18
4611686018509184525	Played on soft banned device	Repeated Ban Evasion Sw1fty box (rule 388)	2020-11-11 06:07:37.930	2020-11-11 05:54:34.160	NULL	174.97.110.18
4611686018509184525	AimJunkies binary found	\??\g:\work files\reclass\x64\plugins\reclasskernel64.sys (8D98DB3A27112A9C92558FF90A1D6206)	2020-11-11 06:09:16.953	2020-11-11 05:50:23.333	AimJunkies (8D98DB3A27112A9C92558FF90A1D6206)	174.97.110.18
4611686018509204329	Reverse Engineering Tool Attached	c:\users\james\desktop\reclass\blah64.exe (4D09FFB3B8CFE53A8250D1A112C4CDE3)	2020-11-11 16:27:50.740	2020-11-11 16:17:23.097	NULL	174.97.110.18
4611686018509204329	Cheat Engine Attached	c:\program files\cheat engine 6.8.3\cheatengine-x86_64.exe (07DD6163D84ED70969EA55A2CECD7F86)	2020-11-11 16:44:55.317	2020-11-11 16:36:18.977	MD5 or Certificate match Cheat Engine	174.97.110.18
4611686018509204329	Played on soft banned device	Repeated Ban Evasion Sw1fty box (rule 388)	2020-11-11 16:46:45.350	2020-11-11 16:36:54.270	NULL	174.97.110.18
4611686018509204329	AimJunkies binary found	\??\c:\y2qiepx1.sys (6E73A01E5DFC8D8DEA4D8A99E9273A04)	2020-11-11 16:48:58.940	2020-11-11 16:21:34.840	AimJunkies (6E73A01E5DFC8D8DEA4D8A99E9273A04)	174.97.110.18
4611686018509206618	AimJunkies binary found	\??\g:\work files\reclass\x64\plugins\reclasskernel64.sys (8D98DB3A27112A9C92558FF90A1D6206)	2020-11-11 17:47:51.770	2020-11-11 17:29:22.493	AimJunkies (8D98DB3A27112A9C92558FF90A1D6206)	174.97.110.18
4611686018509209406	Played on soft banned device	Repeated Ban Evasion Sw1fty box (rule 388)	2020-11-11 21:28:35.333	2020-11-11 21:15:18.827	NULL	67.219.146.72
4611686018509209406	AimJunkies binary found	\??\c:\0658wqvm144y38.sys (6E73A01E5DFC8D8DEA4D8A99E9273A04)	2020-11-11 22:08:59.803	2020-11-11 21:50:20.157	AimJunkies (6E73A01E5DFC8D8DEA4D8A99E9273A04)	67.219.146.72
4611686018509220524	Played on soft banned device	Repeated Ban Evasion Sw1fty box (rule 388)	2020-11-11 22:46:21.237	2020-11-11 22:28:21.583	NULL	67.219.146.74
4611686018509220524	AimJunkies binary found	\??\g:\work files\reclass\x64\plugins\reclasskernel64.sys (8D98DB3A27112A9C92558FF90A1D6206)	2020-11-11 23:09:03.870	2020-11-11 22:29:30.173	AimJunkies (8D98DB3A27112A9C92558FF90A1D6206)	67.219.146.74
4611686018512407923	AimJunkies binary found	\??\c:\s513d1q822.sys (6E73A01E5DFC8D8DEA4D8A99E9273A04)	2021-02-09 20:08:29.820	2021-02-09 19:49:29.727	AimJunkies (6E73A01E5DFC8D8DEA4D8A99E9273A04)	68.235.33.133
4611686018512407923	AimJunkies binary found	\??\g:\work files\reclass\x64\plugins\reclasskernel64.sys (8D98DB3A27112A9C92558FF90A1D6206)	2021-02-09 20:28:44.247	2021-02-09 20:06:51.103	AimJunkies (8D98DB3A27112A9C92558FF90A1D6206)	68.235.33.133
4611686018512409000	AimJunkies binary found	\??\c:\5d6tiw05.sys (6E73A01E5DFC8D8DEA4D8A99E9273A04)	2021-02-09 21:09:15.733	2021-02-09 20:48:53.973	AimJunkies (6E73A01E5DFC8D8DEA4D8A99E9273A04)	68.235.38.237
4611686018512409000	AimJunkies binary found	\??\g:\work files\reclass\x64\plugins\reclasskernel64.sys (8D98DB3A27112A9C92558FF90A1D6206)	2021-02-09 21:27:54.673	2021-02-09 20:48:08.213	AimJunkies (8D98DB3A27112A9C92558FF90A1D6206)	68.235.38.237
4611686018512411450	AimJunkies binary found	\??\c:\nfenyu2umjoq.sys (6E73A01E5DFC8D8DEA4D8A99E9273A04)	2021-02-10 00:27:29.200	2021-02-09 23:57:54.680	AimJunkies (6E73A01E5DFC8D8DEA4D8A99E9273A04)	68.235.38.251
4611686018512412684	AimJunkies binary found	\??\g:\work files\reclass\x64\plugins\reclasskernel64.sys (8D98DB3A27112A9C92558FF90A1D6206)	2021-02-10 01:47:15.503	2021-02-10 00:33:59.667	AimJunkies (8D98DB3A27112A9C92558FF90A1D6206)	68.235.38.242
4611686018512430464	AimJunkies binary found	\??\c:\sbohr4.sys (6E73A01E5DFC8D8DEA4D8A99E9273A04)	2021-02-10 18:47:26.030	2021-02-10 18:31:55.210	AimJunkies (6E73A01E5DFC8D8DEA4D8A99E9273A04)	68.235.33.171
4611686018512658043	AimJunkies binary found	\??\g:\work files\reclass\x64\plugins\reclasskernel64.sys (8D98DB3A27112A9C92558FF90A1D6206)	2021-02-17 23:56:39.540	2021-02-17 23:15:38.397	AimJunkies (8D98DB3A27112A9C92558FF90A1D6206)	38.101.74.24
4611686018512659109	AimJunkies binary found	\??\g:\work files\reclass\x64\plugins\reclasskernel64.sys (8D98DB3A27112A9C92558FF90A1D6206)	2021-02-18 00:36:38.857	2021-02-18 00:07:49.410	AimJunkies (8D98DB3A27112A9C92558FF90A1D6206)	174.97.110.18
4611686018512680599	AimJunkies binary found	\??\c:\jhpfqfd52h8r4.sys (6E73A01E5DFC8D8DEA4D8A99E9273A04)	2021-02-18 19:37:37.123	2021-02-18 19:21:16.733	AimJunkies (6E73A01E5DFC8D8DEA4D8A99E9273A04)	38.101.74.27
4611686018512680599	AimJunkies binary found	\??\g:\work files\reclass\x64\plugins\reclasskernel64.sys (8D98DB3A27112A9C92558FF90A1D6206)	2021-02-18 20:09:23.680	2021-02-18 19:15:50.467	AimJunkies (8D98DB3A27112A9C92558FF90A1D6206)	38.101.74.27
4611686018512681840	AimJunkies binary found	\??\c:\3cm1qeirrpwo.sys (6E73A01E5DFC8D8DEA4D8A99E9273A04)	2021-02-18 20:57:07.517	2021-02-18 20:42:33.230	AimJunkies (6E73A01E5DFC8D8DEA4D8A99E9273A04)	38.101.74.27
4611686018512736520	AimJunkies binary found	\??\g:\work files\reclass\x64\plugins\reclasskernel64.sys (8D98DB3A27112A9C92558FF90A1D6206)	2021-02-21 00:03:21.547	2021-02-20 23:46:15.003	AimJunkies (8D98DB3A27112A9C92558FF90A1D6206)	174.97.110.18

Column1	Column2	Column3	Column4	Column5	Column6	Column7
AccountId	Description	Evidence	DateInfractionDetected	DateInfractionOccurred	EvidenceHash	IPAddress
4611686018512749374	AimJunkies binary found	\??\g:\work files\reclass\x64\plugins\reclasskernel64.sys (8D98DB3A27112A9C92558FF90A1D6206)	2021-02-21 00:45:20.917	2021-02-21 00:20:22.897	AimJunkies (8D98DB3A27112A9C92558FF90A1D6206)	174.97.110.18
4611686018512750184	AimJunkies binary found	\??\c:\nsd0lol1k.sys (6E73A01E5DFC8D8DEA4D8A99E9273A04)	2021-02-21 17:03:33.590	2021-02-21 16:47:46.057	AimJunkies (6E73A01E5DFC8D8DEA4D8A99E9273A04)	174.97.110.18
4611686018512850281	AimJunkies binary found	\??\c:\wdia5a3d.sys (6E73A01E5DFC8D8DEA4D8A99E9273A04)	2021-02-24 20:02:58.550	2021-02-24 19:40:42.320	AimJunkies (6E73A01E5DFC8D8DEA4D8A99E9273A04)	174.97.110.18
4611686018512851748	AimJunkies binary found	\??\g:\work files\reclass\x64\plugins\reclasskernel64.sys (8D98DB3A27112A9C92558FF90A1D6206)	2021-02-24 21:43:00.987	2021-02-24 20:53:35.793	AimJunkies (8D98DB3A27112A9C92558FF90A1D6206)	174.97.110.18
4611686018512853457	AimJunkies binary found	\??\c:\2wqkjr8x5ow4ai.sys (6E73A01E5DFC8D8DEA4D8A99E9273A04)	2021-02-24 22:42:52.763	2021-02-24 22:15:49.073	AimJunkies (6E73A01E5DFC8D8DEA4D8A99E9273A04)	174.97.110.18
4611686018512854352	repeated ban evasion	swifty box - many aimjunkies account bans	2021-02-24 00:00:00.000	2021-02-24 00:00:00.000	NULL	NULL
4611686018514677605	Played on soft banned device	Repeated Ban Evasion (rule 417)	2021-05-12 23:27:17.010	2021-05-12 23:24:40.830	NULL	38.101.74.28
4611686018515012622	Played on soft banned device	Repeated Ban Evasion (rule 417)	2021-05-25 23:14:37.500	2021-05-25 23:09:15.807	NULL	38.101.74.29

83 Total Accounts (Some  
Duplicates)

# **EXHIBIT 2**

# **FILED UNDER SEAL**

# **EXHIBIT 3**

